

### **REMARKS**

Applicants respectfully request reconsideration and allowance in view of the following remarks.

#### **Objection to Specification**

The Office Action objects the Specification because of informalities. Applicants amend paragraph [0025] of the specification as suggested in the Office Action on page 2. Applicants kindly thank the Examiner for bringing this error to our attention.

#### **Rejection of Claims 1 and 3-17 Under 35 U.S.C. §103(a)**

The Office Action rejects claims 1 and 3-17 under 35 U.S.C. §103(a) as being unpatentable over De Brabander (U.S. Patent Publication No. 2004/0243387) ("De Brabander") in view of Yuschik (U.S. Patent No. 7,139,706) ("Yuschik"). Applicants traverse this rejection and submit that the proposed combination of references does not teach or suggest all the claim limitations. Specifically, Applicants submit that De Brabander does not teach or suggest generating a context free grammar representation of the call flow using the graphical representation. Applicants do not acquiesce that it would have been obvious to one of skill in the art to combine De Brabander and Yuschik in the manner proposed in the Office Action. However, Applicants do not argue against their combination because they do not teach or suggest all the claim limitations.

De Brabander does not teach generating a grammar representation using a graphical representation. The Office Action asserts that an RTN, or a network of finite state machines, is equivalent to the context-free grammar representation of the language model recited in claim 1. However, paragraphs [0398]-[0406] of De Brabander teach that the object 3DFsm represents the

RTN to the user. In other words, De Brabander's approach is to use the RTN to generate a 3D representation of the RTN for display to the user. De Brabander's teachings are completely opposite to the approach recited in claim 1. Claim 1 recites first generating a graphical representation of a call flow, then generating a context free grammar representation of the call flow based on the graphical representation. Rather than first generating a graphical representation (the 3D model) and then generating a context free grammar representation using the graphical representation, De Brabander teaches first generating the context free grammar representation (the RTN) and then generating the graphical representation from the grammar representation. De Brabander teaches that a three-dimensional visualization represents an RTN. Paragraph [0527]. With respect to claim 1, De Brabander applies the opposite approach then is claimed when it uses the RTN to generate the 3D model instead of the other way around. In this way, De Brabander teaches directly away from the steps recited in claim 1 of generating the graphical representation first and the grammar representation using the graphical representation.

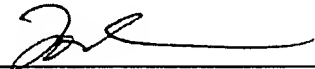
Further in support of this conclusion, De Brabander teaches that language inputs, and not any graphical representations, are used to generate RTNs. Paragraph [0648]. Accordingly, Applicants submit that claim 1 and its dependent claims 3-9 are patentable over the cited references. Applicants further submit that independent claims 10-12 and 17 recite similar limitations to those found in claim 1 and are likewise patentable along with their independent claims. Therefore, Applicants respectfully request that the 35 U.S.C. §103(a) rejection be withdrawn.

**CONCLUSION**

Having addressed all rejections and objections, Applicants respectfully submit that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited. If necessary, the Commissioner for Patents is authorized to charge or credit the **Novak, Druce & Quigg, LLP, Account No. 14-1437** for any deficiency or overpayment.

Respectfully submitted,

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